

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
v.) Criminal No. 19-10063-DJC
RANDALL CRATER,)
Defendant)

STIPULATIONS

Counsel for the United States and counsel for the Defendant have agreed to the following stipulations, which are herein proposed to the Court in a form suitable for presentation to the jury.

I. STIPULATIONS REGARDING AUTHENTICITY OF DIGITAL EVIDENCE

In lieu of live testimony or other evidence at trial, and for purposes of authenticity, counsel for the United States and counsel for the Defendant have stipulated and agreed to the following:

- a. Government Exhibit 1.a is an accurate and authentic representation of a LinkedIn Profile belonging to Defendant Randall Crater, available at <https://www.linkedin.com/in/randall-crater-699a8663/>, and Government Exhibits 1.b through 1.d are accurate and authentic records associated with that LinkedIn Profile obtained from the LinkedIn Corporation.
- b. Records obtained from Apple Inc., pursuant to the search warrant signed on January 24, 2019 related to the greyshore@icloud.com account, are accurate and authentic representations of emails stored by Apple Inc. for the greyshore@icloud.com account.
- c. Records obtained from the Internet Archive, available at <https://archive.org/>, are accurate and authentic representations of website pages as of the date those pages were recorded by the Internet Archive.

II. STIPULATIONS REGARDING AUTHENTICITY OF BUSINESS RECORDS

In lieu of live testimony or other evidence at trial, and for purposes of authenticity, counsel for the United States and counsel for the Defendant have stipulated and agreed to the following:

- a. Records received from Wells Fargo pursuant to subpoena, including Government Exhibits 2.a through 2.b, are accurate and authentic business records from Wells Fargo.
- b. Records received from Bank of America pursuant to subpoena, including Government Exhibits 3.a. through 3.c, are accurate and authentic business records from Bank of America.
- c. Records received from BB&T (also known as Truist Financial Corporation) pursuant to subpoena, including Government Exhibits 4.a through 4.f, are accurate and authentic business records from BB&T.
- d. Records received from CapitalOne pursuant to subpoena, including Government Exhibits 5.a through 5.b, are accurate and authentic business records from CapitalOne.
- e. Records received from the Internal Revenue Service, including Government Exhibit 6, a Certification of Lack of Record, are accurate and authentic business records from the Internal Revenue Service.
- f. Records received from the U.S. Treasury, Financial Crimes Enforcement Network, including Government Exhibit 7, a Certification of Lack of Record, are accurate and authentic business records from the U.S. Treasury, Financial Crimes Enforcement Network.

III. STIPULATION REGARDING INTERSTATE WIRES

In lieu of live testimony or other evidence at trial, counsel for the United States and counsel for the Defendant have stipulated and agreed to the following:

- a. The wire communications identified in Counts 1, 2, 3, and 4 of the Superseding Indictment were transmitted in interstate commerce on or about the dates identified in the Superseding Indictment, and each wire communication was transmitted between Massachusetts and at least one other state on or about the dates identified in the Superseding Indictment.

* * *

Counsel for the United States and counsel for the Defendant further stipulate and agree that if necessary, the party offering the exhibit could (i) call at least one witness who would testify as to each of the above-identified facts and/or (ii) provide a certificate of authenticity of domestic records pursuant to Federal Rules of Evidence 902(11) and 902(13).

Counsel for Defendant

By: 
SCOTT LOPEZ

Counsel for the Government

By: 
CHRISTOPHER J. MARKHAM
Assistant United States Attorney